

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MEMO ENDORSED

JANE DOE,

Pro se Plaintiff,

v.

THE TRUSTEES OF COLUMBIA UNIVERSITY
IN THE CITY OF NEW YORK, et al.,

Defendant# 1,2

Case No.: 25-cv-1108-ER

**REQUESTS FOR EXTENSION
OF TIME AND POSTPONE OF
CONFERENCE**

Pro se Plaintiff Jane Doe requests to extend the deadline for her Reply memorandum to Opposition to Motion for Reconsideration to April 9, 2025.

Extension of time for reply memorandum

This is Plaintiff's second request for extension of time to reply. The original deadline is March 13, 2025; the Court has granted plaintiff's first request and set the new deadline to be April 7, 2025. Defendant Columbia has made frivolous claims in its February 14 request for pseudonymization and sealing Complaint, and advocated for the factually and legally frivolous filing in its March 6 Opposition paper. This Court once granted a motion for sanction in *Sharbat v. Iovance Biotherapeutics, Inc.*, No.20-cv-1391(ER) (S.D.N.Y. Jan. 4, 2023) for similar conducts. Since Plaintiff has been preparing both Reply memorandum and Motion for Sanction under Rule 11 over the past few weeks, she needs additional time to finalize her reply.

Postpone of April 9 Conference

Accordingly, Plaintiff proposes to postpone the April 9 conference until a pro bono counsel is appointed. A public proceeding is too overwhelming for an individual with Aspergers' syndrome (It's possible plaintiff will be too nervous to speak normally in a public proceeding.)

Plaintiff has articulated the merits of the deliberate indifference claim and defamation claims in her Opposition to Proposed Motion to Dismiss and Request for Pro Bono Counsel dated March 26. Although Defendant Columbia once said in its dismissal paper that it might present additional arguments to plaintiff's response, over the past 10 days it didn't.

Dated: April 7, 2025

New York, New York

Doe's reply is due April 9, 2025. The telephonic premotion conference presently scheduled for April 9, 2025, is adjourned to May 8, 2025, at 10 a.m. The parties are instructed to call (855) 244-8681; enter access code 2301 087 7354#; and enter # again when asked to enter the attendee ID number. The parties are further instructed to join the call five (5) minutes prior to the conferences start time.
SO ORDERED.



Edgardo Ramos, U.S.D.J.

Dated: 4/8/2025

New York, New York

/s/ Jane Doe

Jane Doe, *Pro se*

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